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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
SEARS HOLDING CORPORATION,	:	Case No. 18-23538 (RDD)
	:	
Debtors <sup>1</sup>	:	(Joint Administration)
	:	

**SUPPLEMENTAL OBJECTION OF TUTU PARK LIMITED (STORE No. 3829) TO  
DEBTORS' STATED CURE AMOUNT AND RESERVATION OF RIGHTS**

Tutu Park Limited ("TPL") by and through its attorneys Dudley Rich LLP, as and for its  
Supplemental Cure Objection to the Cure Costs stated in Exhibit A to the "Notice of Assumption  
and Assignment of Additional Designable Leases (the "Assumption Notice") (ECF 3298) filed

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxSev, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), LLC. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); Bluel.brht.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Koart.coo LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporation headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

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by Transform Holdco LLC and the above-captioned debtors and debtors in possession (the “Debtors”) represents as follows:

1. On or about October 15, 2018, the Debtors, including Kmart Corporation (“Kmart”) filed petitions under Chapter 11 of Title 11 of the United States Code (“the Bankruptcy Code”). The Debtors have continued to operate their business and manage their properties as a debtors in possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.
2. TPL is the Landlord and Kmart is the Tenant pursuant to that certain unexpired Lease dated as of November 14, 1989, as amended, on January 15, 1992 (the “First Amendment”) as further amended on July 31, 2000 (the “Second Amendment”) (together “the Lease”) for the premises known as the Kmart store unit located at Tutu Park Mall, in St. Thomas, Virgin Islands.
3. On or about January 18, 2019, the Debtor served the “Notice of Cure Costs and Potential Assumption and Assignment of Executory Contracts and Leases in Connection with Global Sale Transaction (the “Cure Notice”) (ECF 1731), which provided at Schedule B, No. 219, Store 3829, that the estimated cure amount due to TPL under the Lease was **\$126,571.00**. The Cure Notice did not include any breakdown of the proposed cure amount.
4. The Cure Notice provided that pursuant to the Global Bidding Procedures Order (ECF 816) the Debtors commenced an auction on January 14, 2019, and then executed an agreement for the purchase of certain assets dated January 17, 2019.

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5. The Cure Notice stated that TPL was receiving the Notice because it may be a Counterparty to a Lease of the Debtors that could be assumed and assigned to the successful bidder.
6. The Cure Notice provided that any objection to the proposed Cure Costs must be filed by January 26, 2019 at 4:00pm EST (the “Cure Objection Deadline”).
7. On January 26, 2019, TPL timely filed its Objection to the Cure Notice (ECF 1867) and attached thereto copies of the Lease and all amendments thereto, and TPL’s Statement of Amounts Due dated January 23, 2019, in the total amount of **\$283,599.20**, with supporting invoices. The amount due included rent due for November and December 2017, sewage line emergency repair costs, CAM charges for 2016 and 2017, water bills for August-December 2018 and January 2019, and 2018 real estate taxes, less credit for partial payments made.
8. The Lease also requires Kmart to pay percentage rent, referred to as “Additional Rent.” Kmart is required to report its total annual gross sales for the period from June 2018 to May 2019 to TPL and to pay an amount equal to 1% of all annual gross sales in excess of \$22 Million. Payment is due thirty (30) days after the end of the lease year. Historically, Kmart's annual gross sales have amounted to approximately \$40 Million. TPL estimates that the total Cure Cost that will be due once gross sales are reported will include additional rent in an amount of \$180,000.00, more or less.
9. The Assumption Notice states that the Cure Amount for TPL’s Store No. 3829 is listed as \$126,571.00, the Cure Objection amount is listed as \$283,599.20 and the disputed amount is listed as \$157,028.00.

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10. Attached hereto as **Exhibit 1** is TPL's Statement of Amounts Due as of April 10, 2019, in the total amount of **\$360,710.69**. The additional amounts due as based upon calculation of the Common Area and Maintenance (CAM) charges for the calendar year 2018 in the amount of **\$79,782.50**.
11. Pursuant to 11 U.S.C.A. § 365(b)(1) the Lease may not be assumed unless all defaults, subject to certain exceptions not applicable herein, are cured and all amounts due are paid.
12. In addition to the foregoing, TPL further joins in the objections and supplemental filed by Debtors' other landlords to the extent that such objections are not inconsistent with the relief requested herein.
13. TPL reserves its rights to make such other and further objections as may be appropriate, including but not limited to, objections regarding adequate assurance of future performance under Section 365.

Accordingly, TPL respectfully requests that (a) this Supplemental Cure Objection be considered and resolved in accordance with the terms of the Assumption Notice and related orders;(b) that any order authorizing the assumption of the TPL Lease affirmatively require the Debtors and/or Assignee to pay all amounts due and all amounts accrued but not yet billed, including attorney's fees and expenses, and (c) grant TPL such further relief as the Court deems appropriate.

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Dated: April 30, 2019

Respectfully submitted,

DUDLEY RICH LLP

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of April 2019, I caused a copy of the foregoing to be served by electronic means through the ECF system to all registered ECF participants, as well as by email to the following parties:

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/s/ Carol Ann Rich  
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